

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Federal Insurance Company
Classic Imports Inc.

Plaintiff,

v.

Case Number: 07cv8606

M/V CMA CGM Puget, her engines, boilers,
tackle, etc., CMA CGM (UK) Shipping Ltd.,
Puget Ltd., Aries Global Logistics Inc.

Defendants.

VERIFIED ANSWER

The Defendant, Aries Global Logistics Inc., by their attorneys, Follick & Bessich, hereby responds to the allegations of Plaintiffs verified complaint as follows::

1- The Defendant, Aries Global Logistics, denies the allegations contained in paragraphs 1, 2, 5 and 6 of the complaint for lack of knowledge or information sufficient to form a belief as to the truth.

2- The Defendant, Aries Global Logistics, denies the allegations contained in paragraphs 3, 4 and 8 in the Plaintiff's complain.

3- The Defendant, Aries Global Logistics, objects to the Plaintiffs demand for Arbitration and appointment of Lucience C. Bulow of New York City as the arbitrator, as set forth in paragraph 7 of the complaint.

AS AND FOR THE
FIRST AFFIRMATIVE DEFENSE

Aries Global Logistics did not pack the goods overseas nor did they deliver the goods to the necessary parties upon arrival into the United States. Aries arranged the transportation of goods only and did not serve as the U.S. Customs Broker. The Defendant Aries Global Logistics is in no way obligated to the Plaintiffs.

AS AND FOR THE
SECOND AFFIRMATIVE DEFENSE

Aries Global Logistics breached no duty or obligation to the Plaintiffs.

AS AND FOR THE
THIRD AFFIRMATIVE DEFENSE

Aries Global Logistics owed no duty or obligation to the Plaintiffs

AS AND FOR THE
FOURTH AFFIRMATIVE DEFENSE

If merchandise was damaged during shipping, it was caused by one of the other named Defendants.

AS AND FOR THE
FIFTH AFFIRMATIVE DEFENSE

Aries Global Logistics, adopts by references, any additional applicable defenses pleaded by any other defendants and not otherwise stated herein.

AS AND FOR THE
SIXTH AFFIRMATIVE DEFENSE

Aries Global Logistics will rely upon any and all further defenses that become available or

appear during discovery or pretrial proceedings in this action, and hereby specially reserve the right to amend this Answer for the purpose of asserting any additional defenses.

WHEREFORE, Aries Global Logistics Inc., respectfully requests that this matter be dismissed against them, as well as any other relief the Court deems appropriate.

Dated: October 30, 2007



Glenn H. Ripa, Esq.

Attorney Bar Code: GR2555

Follick & Bessich P.C.

Attorneys for Aries Global Logistics

225 Broadway, Suite 1607

New York, New York 10007

Tel. No.: 212-732-5310

Fax No.: 212-406-2908

VERIFICATION

STATE OF NEW YORK)

ss.:

COUNTY OF NEW YORK)

GLENN H. RIPA, an attorney admitted to practice in the State of New York and the Southern District Court of New York, affirms:


That he is the attorney for Aries Global Logistics., a Defendant in the within action; that he has read the foregoing Complaint and knows the contents thereof; that the same is true to affirmant's own knowledge, except as to the matters therein stated to be on information and belief, and as to those matters, affirmant believes them to be true.

The undersigned further states that the reason this affirmation is made by affirmant and not by Aries Global Logistics is because said Defendant does not reside in the County of New York wherein affirmant's office is located.

The grounds of affirmant's belief as to all matters not stated to be upon affirmant's knowledge are information and investigation obtained by affirmant in the course of his duties as attorney for the Defendant.

The undersigned affirms that the foregoing statements are true, under penalties of perjury.

Dated: New York, New York
October 30, 2007



GLENN H. RIPA

AFFIRMATION OF SERVICE

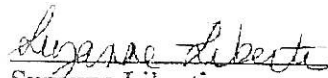
SUZANNE LIBERTI, ESQ. affirms under the penalties of perjury that on October 30, 2007 on behalf of Aries Global Logistics Inc., she caused the annexed *Answer and Verification* to be served upon the following parties:

Kingsley, Kingsley & Calkins
Attorneys for Federal Insurance Company and Classic Imports Inc.
91 West Cherry Street
Hicksville, NY 11801

CMA CGM (UK) Shipping Ltd.
4th Floor, 1 Warwick Row
London, SW1E5ER, United Kingdom

Puget Ltd.
C/o CMA CGM (UK) Shipping Ltd.
4th Floor, 1 Warwick Row
London, SW1E5ER, United Kingdom

by depositing a true copy thereof in a United States Postal Service receptacle, properly enclosed in a securely sealed envelope, duly franked with appropriate postage thereon, and addressed to the respective party, as above indicated.


Suzanne Liberti